## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

DOROTHY A. LANGFORD	)
	)
Plaintiff,	)
	)
vs.	) CASE NO. 2:06-cv-1025-WK
	)
	)
McDONALD'S CORPORATION	)
	)
Defendant.	)
	)

### MOTION FOR EXTENSION OF TIME FOR DEFENDANT McDONALD'S CORPORATION TO RESPOND TO PLAINTIFF'S COMPLAINT

COMES NOW Defendant McDonald's Corporation ("McDonald's), and respectfully requests an additional ten (10) days to file its response to Plaintiff's Complaint. As grounds therefore, McDonald's states the following:

- 1. Plaintiff filed her Complaint in the United States
  District Court for the Middle District of Alabama against
  McDonald's on November 15, 2006. Service was perfected on
  Defendant McDonald's on November 21, 2006. Defendant's counsel
  did not receive a copy of the Complaint until November 27, 2006.
- 2. Defendant's counsel has consulted with Planitiff's counsel regarding the requested extension of time. Plaintiff's counsel does not object to McDonald's request for an additional

ten (10) days, through and until Thursday, December 21, 2006, to file its response.

3. This extension is requested because McDonald's requires, in good faith, additional time to complete its factual investigation prior to responding to Plaintiff's Complaint. As such, this request is not interposed for the purpose of delay, and no prejudice will result to any party from the granting of this request.

WHEREFORE, Defendant McDonald's Corporation respectfully requests that this Court grant this Consent Motion, and allow McDonald's an additional ten (10) days, through and until Thursday, December 21, 2006, to file its response in the abovestyled cause. A proposed Order is attached hereto as Exhibit "A" for this Court's consideration.

This 7th day of December, 2006

Respectfully submitted,

s/ M. Kristi Wallace
M. Kristi Wallace
Alabama Bar No. ASB-2980-A30M

One of the Attorneys for Defendant McDonald's Corporation

### OF COUNSEL:

### HOLLAND & KNIGHT LLP

One Atlantic Center, Suite 2000 1201 West Peachtree Street, NE Atlanta, Georiga 30309-3400 (404) 817-8500 (Telephone) (404) 881-0470 (Facsimile) kristi.wallace@hklaw.com

# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

DOROTHY A. LANGFORD	)	
Plaintiff,	)	
vs.	) CASE NO. 2:06-cv-1025-W	KW
Madonal D.C. Goddodawton	)	
McDONALD'S CORPORATION	)	
Defendant.	) )	

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 7, 2006, I electronically filed this MOTION FOR EXTENSION OF TIME FOR DEFENDANT McDONALD'S CORPORATION TO RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorney of record:

Jackson B. Harrison The Harrison Law Firm, LLC 8425 Crossland Loop Montgomery, Alabama 36117 lisaandbrett96@yahoo.com

This 7th day of December, 2006

Respectfully submitted,

s/ M. Kristi Wallace
M. Kristi Wallace
Alabama Bar No. ASB-2980-A30M

One of the Attorneys for Defendant McDonald's Corporation

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# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

DOROTHY A. LANGFORD	)
Plaintiff,	)
vs.	) CASE NO. 2:06-cv-1025-WF
	)
McDONALD'S CORPORATION	)
Defendant.	) )

#### ORDER

THIS COURT, having reviewed all the information contained in the foregoing Motion for Extension of Time for Defendant McDonald's Corporation to Respond to Plaintiff's Complaint, hereby GRANTS McDonald's Motion and ORDERS an extension of time for McDonald's to respond to Plaintiff's Complaint through and including December 21, 2006.

SO ORDERED.

This \_\_\_\_\_ day of December, 2006.

HONORABLE W. KEITH WATKINS DISTRICT COURT JUDGE